UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

EDNA WEBB, et al.,	§	
Plaintiffs,	§	
	§	No. 4:14-cv-03302
v.	§	Consolidated with
	§	Adams v. Livingston, 4:14-cv-3326
	§	Togonidze v. Livingston, 4:14-cv-3324
BRAD LIVINGSTON, et al.,	§	
Defendants.	§	

<u>DEFENDANT TEXAS DEPARTMENT OF CRIMINAL JUSTICE'S</u> NOTICE OF THIRD SUPPLEMENTAL DISCLOSURES TO PLAINTIFFS

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Defendant Texas Department of Criminal Justice (TDCJ), by and through its attorney of record, the Office of the Attorney General for the State of Texas, to give notice to the Court of Defendant TDCJ's Third Supplement to Initial Disclosures to Plaintiffs in accordance with Rule 26(a)(1) of the Federal Rules of Civil Procedure.

This supplemental disclosure consists of records which are also responsive to: (a) Plaintiff Kevin Webb's First Requests for Production upon TDCJ numbers 4, 20, 32, and 33 and (b) Plaintiffs' Second Consolidated Requests for Production upon TDCJ numbers 4, 7, 11, and 66. TDCJ's responses to these requests for production were supplemented concurrently with this Third Supplemental Disclosure.

DATED: January 11, 2017

Respectfully submitted,

KEN PAXTON

Attorney General of Texas

JEFFREY C. MATEER

First Assistant Attorney General

BRANTLEY STARR

Deputy First Assistant Attorney General

JAMES E. DAVIS

Deputy Attorney General for Civil Litigation

LACEY E. MASE

Assistant Attorney General Chief, Law Enforcement Defense Division

/s/Harold J. Liller

HAROLD J. LILLER

Assistant Attorney General Co-Counsel State Bar No. 24029689 Southern District ID No. 351997 Harold.Liller@oag.texas.gov

CYNTHIA L. BURTON

Assistant Attorney General Attorney in Charge State Bar No. 24035455 Southern District ID No. 35273 Cynthia.Burton@oag.texas.gov.gov

MATTHEW J. GREER

Assistant Attorney General Co-Counsel State Bar No. 24069825 Southern District ID No. 1171775 Matthew.Greer@oag.texas.gov

AMANDA M. KATES

Assistant Attorney General Co-Counsel State Bar No. 24075987 Southern District No. 2878366 Amanda.Kates@oag.texas.gov

DANIEL C. NEUHOFF

Assistant Attorney General Co-Counsel State Bar No. 24088123 Southern District No. 2374885 Daniel.Neuhoff@oag.texas.gov

Office of the Attorney General of Texas Law Enforcement Defense Division P. O. Box 12548, Capitol Station Austin TX 78711 (512) 463-2080/Fax (512) 936-2109

ATTORNEYS FOR TDCJ DEFENDANTS

NOTICE OF ELECTRONIC FILING

I, **HAROLD J. LILLER**, Assistant General of Texas, do hereby certify that I have electronically submitted for filing, a true and correct copy of the above in accordance with the Electronic Case Files System of the Southern District of Texas, on this the 11th day of January, 20176.

/s/Harold J. Liller
HAROLD J. LILLER
Assistant Attorney General

CERTIFICATE OF SERVICE

I, **HAROLD J. LILLER**, Assistant Attorney General of Texas, do hereby certify that a true and correct copy of the above and foregoing Defendant Texas Department of Criminal Justice's Notice of Third Supplemental Disclosures to Plaintiffs has been served by e-mail and via CMRRR, on this 11th day of January, 2017 addressed to:

Attorneys for Plaintiffs

Jeff Edwards
Scott Medlock
David James
The Edwards Law Firm
1101 E. 11th Street,
Austin, Texas 78702-1908

ViaCMRRR 7007 0220 0000 5721 4225

and via e-mail to: jeff@edwards-law.com scott@edwards-law.com david@edwards-law.com

Attorneys for UTMB Defendants

Lee Haney Via e-mail to: lee.haney@oag.texas.gov

Kara Stauffer Via e-mail to: kara.stauffer@asb.legal

/s/Harold J. Liller

HAROLD J. LILLER

Assistant Attorney General